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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAHMEL PENNY,

Defendant.

Case No. 2:19-cr-059-MMD-VCF

**STIPULATION TO CONTINUE
HEARING ON REVOCATION OF
PRETRIAL RELEASE
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between the United States, by and between Nicholas A. Trutanich, United States Attorney, and Linda Mott, Assistant United States Attorney, counsel for the United States of America, and Lance Hendron, counsel for Defendant, that the hearing on revocation of pretrial release, currently scheduled for October 1, 2019, be vacated and set to a date and time convenient to this Court, but no sooner than 7 days from the current scheduled hearing.

The request for continuance is for the following reasons:

1. Defendant Penny appeared before the court on Monday, September 23, 2019, based upon a petition for action on conditions of pretrial release.

1 2. Penny submitted to detention pending the gathering of various documents
2 that he wishes to present at hearing.

3 3. A hearing on the petition is set for October 1, 2019.

4 4. Counsel for defense will be unable to gather the documents for hearing by
5 October 1, 2019.

6 5. The parties stipulate to continuing the hearing to a setting at the Court's
7 convenience. If the Court is so inclined, both parties are available on October 8, 2019.

8 DATED this 26th day of September, 2019.

9 NICHOLAS A. TRUTANICH
10 United States Attorney

11 /s/ Linda Mott
12 LINDA MOTT
 Assistant United States Attorney

13 /s/ Lance Hendron
14 LANCE HENDRON
15 Counsel for Rahmel Penny

